

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>GALLERIA 2425 Owner, LLC</b>  <b>Debtor.</b>	§ § § § §	<b>Case No. 23-34815 (JPN)</b>  <b>Chapter 11</b>
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**NATIONAL BANK OF KUWAIT, S.A.K.P. NEW YORK BRANCH’S  
SUPPLEMENT TO EMERGENCY MOTIONS TO ENFORCE SALE ORDERS**

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**TO THE HONORABLE JEFFREY P. NORMAN, UNITED STATES BANKRUPTCY JUDGE:**

National Bank of Kuwait, S.A.K.P., New York Branch (“NBK”), for itself and Houston 2425 Galleria, LLC (“NBK’s Assignee”), supplements its emergency motions to enforce the sale order [ECF Nos. 838 and 839] (collectively, the “Motions”) and states the following:

1. After yesterday’s December 5, 2024, hearing on the Motions (the “Hearing”), NBK discovered that Ali Choudhri recorded a *Notice of Lis Pendens* by Jetall Companies, Inc. (“Jetall”) in the Real Property Records of Harris County, Texas on December 2, 2024 (the “Lis Pendens”). The *Lis Pendens* was recorded against the real property located at 2425 West Loop South, Houston, Texas (the “Property”). The Property is the subject of the Motions and the Court’s Sale Order for the Property [ECF No. 608]. The lawsuit referenced in the *Lis Pendens* was removed to this Court on December 3, 2024. *See* Adversary Proceeding No. 24-03257. A certified copy of the *Lis Pendens* is attached as **Exhibit A**.

2. Jetall did not mention or otherwise disclose the existence of the *Lis Pendens* before, at or after the Hearing, although it filed a response to the Motions before the Hearing on December 4, 2024 [ECF No. 848], actively participated during the Hearing [ECF No. 853] and filed a post-Hearing supplement [ECF. No. 855].

3. The recording of the *Lis Pendens* reflects a continuing pattern by Jetall and Mr. Choudhri to try to cloud title to the Property, which has been sold free and clear of all claims, liens encumbrances and other interests pursuant to the Sale Order and in violation of the Sale Order [ECF No. 608], and to avoid, as it relates to NBK and NBK's Assignee, the gatekeeping provisions of the confirmed plan of liquidation in this case [ECF No. 566].

4. This development underscores the need for the immediate relief requested in the Motions, including prohibiting any additional actions to cloud title as provided in the Sale Order and for that relief to be expanded to terminate the *Lis Pendens*.

DATED: December 6, 2024

**PILLSBURY WINTHROP SHAW PITTMAN LLP**

/s/ Charles C. Conrad

Charles C. Conrad  
Texas State Bar No. 24040721  
Ryan Steinbrunner  
Texas State Bar No. 24093201  
609 Main Street Suite 2000  
Houston, TX 77002  
Telephone: (713) 276-7600  
Facsimile: (713) 276-7634  
charles.conrad@pillsburylaw.com  
ryan.steinbrunner@pillsburylaw.com

- and -

Andrew M. Troop (Bar No. MA547179)  
Patrick E. Fitzmaurice\*  
Kwame O. Akuffo\*  
31 West 52nd Street  
New York, NY 10019-6131  
Telephone: (212) 858-1000  
Facsimile: (212) 858-1500  
andrew.troop@pillsburylaw.com  
patrick.fitzmaurice@pillsburylaw.com  
kwame.akuffo@pillsburylaw.com

\*Admitted *pro hac vice*

***Counsel for National Bank of Kuwait, S.A.K.P., New York Branch***

**CERTIFICATE OF SERVICE**

I certify that, on December 6, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and to the following parties via email:

Joseph Carl Cecere, II  
Cecere PC  
6035 McCommas Blvd  
Dallas, TX 75206  
ccecere@cecerepc.com

Stephen Wayne Sather  
Barron Newburger, PC  
7320 N Mopac Expy Ste 400  
Austin, TX 78731  
ssather@bn-lawyers.com

David Neal Stern  
Barron Newburger, PC  
7320 N Mopac Expy Ste 400  
Austin, TX 78731  
dstern@bn-lawyers.com

2425 WL LLC  
c/o Ali Choudhri  
ali@jetallcompanies.com  
ali@jetallcapital.com

Mark Edwin Smith  
Barron Newburger, PC  
7320 N Mopac Expy Ste 400  
Austin, TX 78731  
msmith@bn-lawyers.com

J. Marcus Hill  
Hill & Hill, P.C.  
1770 St. James Street, Ste 440  
Houston, TX 77056  
marc@hillpclaw.com

Justin Rayome  
1606 Caslyn Drive  
Rosenberg, TX 77471  
justinrayome3@gmail.com

/s/ Charles C. Conrad  
Charles C. Conrad